

**UNITED STATES BANKRUPTCY COURT  
DISTRICT OF NEW JERSEY**

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and Gregg Salzman*

In Re:  
  
AMERICAN CENTER FOR CIVIL JUSTICE,  
INC.

Debtor-in Possession.

Case No.: 18-15691 (CMG)  
Chapter: 11  
Judge: Christine M. Gravelle

**Hearing Date and Time:**  
**May 29, 2018 at 10:00 a.m.**

**ORAL ARGUMENT REQUESTED**

**CERTIFICATION OF ROBERT J. TOLCHIN, ESQ. IN SUPPORT OF  
MOTION OF DIANA CAMPUZANO, AVI ELISHIS AND GREGG  
SALZMAN FOR APPOINTMENT OF CHAPTER 11 TRUSTEE  
PURSUANT TO 11 U.S.C. § 1104(a) AND FED R. BANKR. P. 2007.1**

I, Robert J Tolchin, Esq., of full age, certify as follows:

1. I am licensed to practice law in the States of New York and New Jersey, and am a member of the Bar of this Court. I am counsel to The Berkman Law Office, LLC, attorneys for the Movants herein, Diana Campuzano, Avi Elishis and Gregg Salzman (“Movants”) in this matter. I make this Certification in support of the within Motion of Diana Campuzano, Avi Elishis and Gregg Salzman for Appointment of a Chapter 11 Trustee Pursuant To 11 U.S.C. § 1104(a) and Fed R. Bankr. P. 2007.1 (the “Motion”).

2. Annexed hereto as Exhibit A is a true copy of an order dated February 18, 2019 in *Campuzano v. Sher*, Supreme Court of the State of New York, Nassau County index number 605379/16 (“Campuzano Litigation”).

3. Annexed hereto as Exhibit B is true copy of the operative complaint in *Engelberg v. Perr*, Supreme Court of the State of New York, Nassau County index number 606919/14 (“Engelberg Derivative Litigation”).

4. Annexed hereto as Exhibit C is a true copy of the answer filed by defendants Eliezer Perr, Jedidiah Perr, and Milton Pollack in the Engelberg Derivative Litigation.

5. Annexed hereto as Exhibit D is a true copy of the answer filed by defendant American Center for Civil Justice (“AC CJ”) in the Engelberg Derivative Litigation.

6. Annexed hereto as Exhibit E is true copy of an agreement dated April 12, 2007 between the American Center for Civil Justice and the American Center for Civil Justice, Religious Liberty and Tolerance, Inc.

7. Annexed hereto as Exhibit F is true copy of an order entered April 23, 2015 in the Engelberg Derivative Litigation.

8. Annexed hereto as Exhibit G is true copy an order entered June 22, 2016 in the Engelberg Derivative Litigation.

9. Annexed hereto as Exhibit H is true copy of an order entered May 19, 2017 in the Engelberg Derivative Litigation.

10. Annexed hereto as Exhibit I is true copy of an order entered November 30, 2017 in the Engelberg Derivative Litigation.

11. Annexed hereto as Exhibit J is true copy of an order entered January 4, 2018 in the Campuzano Litigation.

12. Annexed hereto as Exhibit K is true copy of a stipulation of settlement dated December 7, 2017 in the Engelberg Derivative Litigation.

13. Annexed hereto as Exhibit L is true copy of transcript of the 341 meeting conducted in this proceeding on April 19, 2018.

14. Annexed hereto as Exhibit M is true copy of the IRS Form 990 tax return filed by the American Center for Civil Justice, Religious Liberty and Tolerance, Inc. for tax year 2012.

15. Annexed hereto as Exhibit N is true copy of the brief filed on behalf of Michael Engelberg in the Supreme Court of the State of New York, Appellate Division, Second Department, docket no. 2015-5938, in the Engelberg Derivative Litigation.

16. Annexed hereto as Exhibit O are true copies of letters from Jedidiah Perr dated July 4, 2011, July 15, 2013, March 24, 2015, April 30, 2014, May 28, 2014, and September 9, 2014 written on the letterhead of, and signed by Jedidiah Perr on behalf of, the Debtor American Center for Civil Justice.

17. Annexed hereto as Exhibit P is a true copy of an order entered March 1, 2018 in the Engelberg Derivative Litigation.

I certify that the foregoing statements made by me are true. I am aware that if any of the foregoing statements made by me are willfully false, I am subject to punishment.

Dated: May 8, 2018

/s/ Robert J. Tolchin  
Robert J. Tolchin, Esq.